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The Albion-Sheridan Landfill PRP Group

May 9, 1997

Mr. Jon Peterson
U.S. EPA - Region V
Waste Management Division
77 W. Jackson Blvd. - HSRW-6J
Chicago, IL 60604

Subject: Response to April 21, 1997 MDEQ Letter And April 7, 1997 EPA E-mail
Albion-Sheridan Township Landfill, Albion, Michigan
Project No. 6E13045

Dear Mr. Peterson:

Woodward-Clyde Consultants (WCC) has completed this response on behalf of the Albion-Sheridan Township Landfill PRP Group (The Group) to address the Michigan Department of Environmental Quality's (MDEQ) April 21, 1997 correspondence regarding Comment 40 as well as to the additional well location issue discussed in your April 7, 1997 e-mail.

Comment 40 refers to MDEQ's response that a petion for a mixing zone determination will be required. MDEQ Operational Memorandum #8 states: "Demonstration of compliance with surface water requirements may be made by assessing groundwater concentrations at the groundwater-surface water interface or through evaluation of mixing zone, whichever is approprate for a particular site." (emphasis added) WCC has reviewed the analytical results from the Pre-Design Studies (WCC, 1996) groundwater sampling event and has found no exceedences of Groundwater/Surfacewater Interface (GSI) Values (Generic Residential Cleanup Criteria for Groundwater and Soil, Revision 4, June 5, 1995) in the monitoring wells adjacent to the river. Therefore, establishment of mixing zone criteria for venting of groundwater is not necessary.

The MDEQ indicated to the U.S. EPA, and you indicated to the Group where the last two monitoring wells should be located. The Group agrees with the recommended location of MW15SB.

The Group disagrees with the recommended location of the remaining well, which is to be placed in the shallow or weathered bedrock on the south side of the river. The hydrogeologic and analytical information that would be gathered at this location would not detect site constituents because the groundwater migration direction in the recommended location is from south to north, toward the river, and toward the site, and not from the site toward the

well. Figure 1 (attached) presents a hydrogeologic cross-section that shows there is no possibility for dissolved constituents to cross under the river because it is a hydraulic divide for the unconfined aquifer at the site and extending to the river.

The vertical groundwater gradient in clustered wells confirm an upward gradient from the shallow bedrock to the overlying weathered bedrock in the monitoring locations between the landfill and the river. Further, there is an upward gradient from the deep bedrock to the shallow bedrock in the MW16 cluster adjacent to the river. These data further support our conclusion that the groundwater would not flow under the river.

The Group suggests that if MDEQ believes an additional well is necessary, that it be located north of the railroad tracks to detect potential landfill constituents.

If you have any questions regarding these issues, do not hesitate to contact me at (313) 464-1800 or Bob Gibson (Minneapolis Office) at (612) 594-5650.

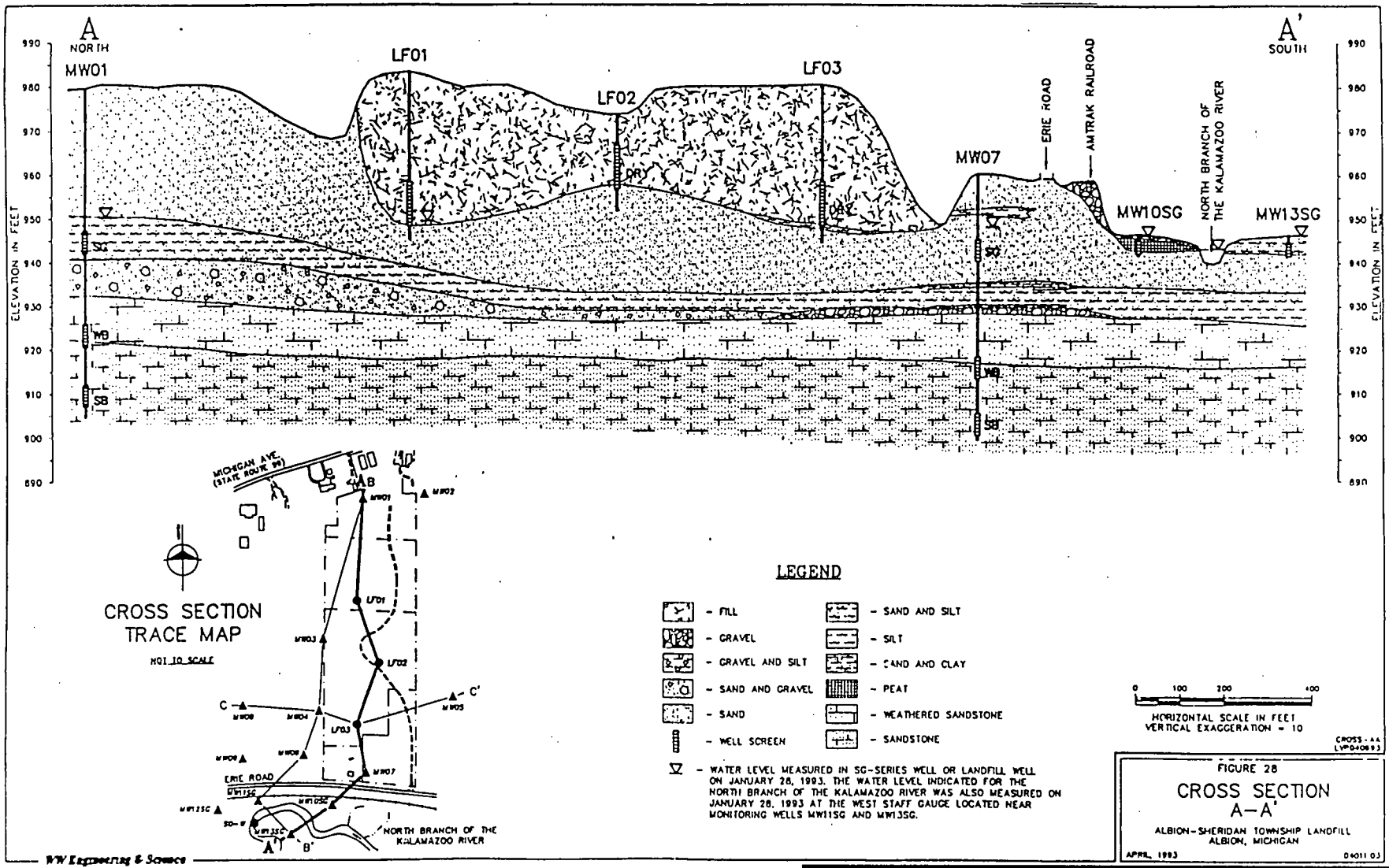
Sincerely,

John Seymour

John Seymour, P.E.
Project Coordinator

RGG:rgg

cc:	Elizabeth Bartz (2)	EARTH TECH
	Kim Sakowski (2)	MDEQ
	Christopher Smith	Cooper Industries
	Jack Gray	Corning Incorporated
	Bob Gibson	Woodward-Clyde Consultants



Woodward-Clyde Consultants
ENGINEERS, GEOLOGISTS, AND ENVIRONMENTAL SCIENTISTS

CROSS-SECTION MAP FROM
W.W. ENGINEERING & SCIENCE

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